

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)
ECF Case

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN)

JAMES P. KREINDLER, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Ashton* plaintiffs in the above-captioned litigation and I submit this declaration in support of the motion for final judgment on behalf of the individual plaintiffs listed in the exhibit attached hereto as Exhibit A, and for permission to allow any remaining *Ashton* plaintiffs to move for the same relief in separate stages.

2. The source of my information and the basis for my belief in my statements contained herein is my personal involvement in this matter for over 17 years; my firm's representation of the *Ashton* plaintiffs listed in Exhibit A in connection with the September 11th litigation; communications directly from family members of the individuals killed in the attacks on September 11th and the plaintiffs listed in Exhibit A; and other court records relating to the multi-district litigation to which the *Ashton* plaintiffs are parties. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

3. The decedents listed in Exhibit A died in the September 11th terrorist attacks and are survived by the immediate family members listed in Exhibit A. The relationships set forth in Exhibit A have been personally verified by staff members in my office who have obtained written documentation, retrieved biographical paperwork (such as marriage certificates, birth certificates, baptismal certificates, obituary notices and wedding announcements) and/or conducted interviews

with the family members listed in Exhibit A (or with their other family members) confirming the relationships set forth there.

4. To minimize the chance of any human error, my firm has instituted a further level of quality control, during which each client's file is reviewed a second time and the relationships and other information contained in Exhibit A are corroborated, as is the fact that the claimants all survived the deaths of their loved ones on September 11, 2001.

5. We have been retained by the plaintiffs listed in Exhibit A to pursue recovery for their solatium losses arising out of the deaths of their loved ones on September 11, 2001. Each claimant listed in Exhibit A is the immediate family member of a person killed on September 11, 2001 whose estate was previously awarded a final default judgment on liability against Iran in relation to the September 11, 2001 Terror Attack. We have verified that none of the plaintiffs listed in Exhibit A has recovered for his or her solatium damages previously by reviewing court dockets and cross-checking those individuals with other attorneys representing the relatives of persons killed on September 11, 2001, nor do they have any other pending motion before this Court for compensation against Iran arising out of the September 11th attacks.

6. As for those family members listed on Exhibit A, my office has confirmed their nationality based on either birth certificates, documentation previously submitted to government programs (such as the September 11th Victim Compensation Fund) and / or through written or verbal interviews with the claimants.

7. For all of the reasons set forth in this declaration and the *Ashton XIII* Wrongful Death Plaintiffs' Motion for Final Judgments, I respectfully request that this Court grant the proposed order attached hereto as Exhibit B.

Dated: August 19, 2019

New York, NY

/s/ James P. Kreindler

James P. Kreindler